BEFORE THE POSTAL RATE COMMISSION

RECEIVED

JUL 27 12 17 PM *00

POSTNE TOTE SEED AND SECTION OF THE SECTION OF THE

POSTAL RATE AND FEE CHANGES, 2000

DOCKET NO. R2000-1

RESPONSE OF UNITED PARCEL SERVICE WITNESS STEPHEN E. SELLICK TO QUESTION POSED AT HEARINGS BY UNITED STATES POSTAL SERVICE (July 27, 2000)

During oral cross-examination of UPS witness Stephen E. Sellick on his RPW testimony (UPS-T-4), counsel for the Postal Service asked Mr. Sellick to provide the instruction in the RPW "Data Collection User's Guide for Revenue, Volume, and Performance Measurement Systems" (Postal Service Handbook F-75, Library Reference USPS-LR-I-37) which instructs DRPW data collectors "that Standard A mail entered at Standard B rates should be recorded still as Standard A mail." Tr. 31/15201. Mr. Sellick's response is attached.

Respectfully submitted,

John E. McKeever William J. Pinamont Phillip E. Wilson, Jr.

Attorneys for United Parcel Service

Piper Marbury Rudnick & Wolfe LLP 3400 Two Logan Square 18th & Arch Streets
Philadelphia, PA 19103-2762 (215) 656-3310 (215) 656-3301 (FAX) and 1200 Nineteenth Street, NW Washington, DC 20036-2430 (202) 861-3900

Of Counsel.

RESPONSE OF UNITED PARCEL SERVICE WITNESS STEPHEN E. SELLICK TO REQUEST OF UNITED STATES POSTAL SERVICE AT HEARINGS

Tr. 31/15201. Please provide the instruction to DRPW data collectors indicating "that Standard A mail entered at Standard B rates should be recorded still as Standard A mail."

RESPONSE: The instruction in effect in FY1998 stated, "If you find a Standard Mail (A) mailpiece that has been paid at the Standard Mail (B) rate, record this mailpiece as Standard Mail (A) Single Piece." It is found on pages 3-83 and 3-95 of Handbook F-75, "Data Collection User's Guide for Revenue, Volume, and Performance Measurement Systems," Library Reference USPS-LR-I-37. See also USPS-LR-I-37 at 3-149 and 3-156. Copies of these pages are attached.

- Standard Mail (A) Single Piece paid at Standard Mail (B) rates: If you find a Standard Mail (A) mailpiece that has been paid at the Standard Mail (B) rate, record this mailpiece as Standard Mail (A) Single Piece. Choose Other Revenue and enter the revenue as Paid Correctly. Under most circumstances, you will find such mail on its initial delivery attempt and bearing PVI meter postage. You may also find this mailpiece when it is being returned and a postage due clerk is marking it up at the Standard Mail (B) rate.
- 1 From your *Main Options Menu*, select Option <3> Standard Mail (A).

 CODES displays one of two *Main Options Menu* screens (Figure 3-21 or Figure 3-22). Select Option <3> Standard Mail (A).
- 2 Select the rate category that corresponds to your malipiece(s) by performing the substeps that follow the screen shown below.

CODES will display the *Standard Mail (A) Options Menu* (Figure 3-37). For examples and a consolidated procedure that includes both rate category selection and final verification guidelines, refer to RM 3-06.

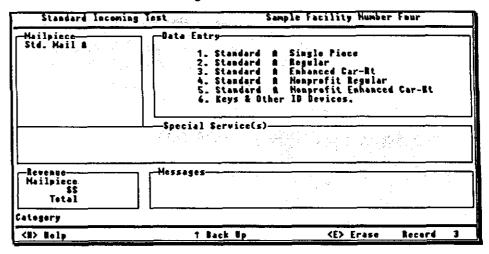


Figure 3-37. Standard Mail (A) Options Menu

- a Check to see if the mailpiece is Standard Mail (A) Regular, Standard Mail ECR, Standard Mail (A) Nonprofit, Standard Mail (A) Nonprofit ECR, or Standard Mail (A) Single Piece.
 - If the mailpiece is endorsed Bulk Rate or Blk. Rt., it is either Standard Mail (A) Regular or Standard Mail (A) Enhanced Carrier Route (ECR). If either is the case, go to Step 2b.

- iv. If the mailpiece bears an automation rate barcode, record the mailpiece as *Basic Automation*, *No destination discount*.
- v. If the mailpiece has not yet been classified, record the mailpiece as Basic Automation. No destination discount.
- 12 For all Standard Mall (A) Regular, ECR, Nonprofit Regular, and Nonprofit ECR, go to Step 2 of Section 3.10.5.

3.10.4 Standard Mail (B)

As you enter data into the CODES software, a record of your entries for your current mailpiece will be displayed in the upper left field of the CODES Laptop screen.

Standard Mail (B): This mailpiece is not marked First-Class, Priority, or Periodicals. With the exception of Library Mail and Special Mail, Standard Mail (B) weighs 16 ounces or more. It has the following dimensions and weight limitations: each piece may not exceed 70 Lbs., except matter at bound printed matter rates (which may not exceed 10 pounds). The combined length and girth of a piece may not exceed 108 inches.

Note the following exceptions:

- Bound Printed Matter (BPM) Permit Imprint: BPM Permit Imprint mailpieces are not countable in the RPW test.
- Unendorsed mail over 16 ounces: With one exception, always record unendorsed mail weighing 16 ounces or greater as Standard Mail (B) zone rated parcel mail. The one exception to this rule is when the mailpiece bears metered or stamped postage equal to or greater than what the mailpiece's Priority rate would be if you were to base this rate upon the mailpiece's zone and weight. If the unendorsed mailpiece weighs more than 16 ounces and the metered or stamped postage is equal to or greater than the Priority rate consistent with the mailpiece's zone and weight, record the mailpiece as Priority Mail. For more information on unendorsed mail, see Section 3.15, Part 5, Unendorsed Mail.
- Standard Mail (A) paid at Standard Mail (B) rates: If you find a Standard Mail (A) mailpiece that has been paid at the Standard Mail (B) rate, record this mailpiece as Standard Mail (A) Single Piece. Choose Other Revenue and enter the revenue as Paid Correctly. Under most circumstances, you will find such mail on its initial delivery attempt and bearing PVI meter postage. You may also find this mailpiece when it is being returned as postage due.

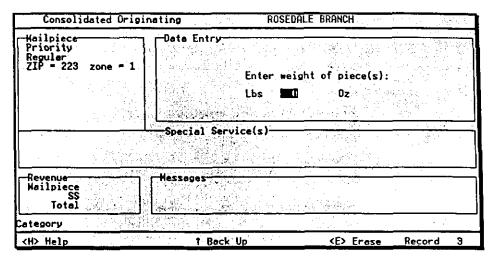


Figure 3-121. Priority Manual Weight of Mailpieces

6 Record the COD or the insurance fee. Then go to Section 3.12.8.

CODES will display the *COD Fee* screen or the *Insurance Fee* screen (see Figure 3-116 or Figure 3-117). Enter the amount of the COD or insurance revenue shown on the mailpiece and press <Enter>.

3.12.3 Standard Mail (A), COD, and Insured

As you input data into the CODES software, a record of your entries for your current mailpiece will be displayed in the upper left field of the CODES Laptop screen.

Standard Mail (A): This mail is neither mailed or required to be mailed as First-Class, nor is it entered as Periodicals. Each Standard Mail (A) mailpiece must weigh less than 16 ounces.

Observe the following guidelines and exceptions to Standard Mail (A) originating mail:

Standard Mail (A) Single Piece paid at Standard Mail (B) rates: If you find a Standard Mail (A) single-rated mailpiece that has been paid at the Standard Mail (B) rate, record this mailpiece as Standard Mail (A) Single Piece. Choose Other Revenue and enter the revenue as Paid Correctly. Under most circumstances, you will find such mail on its initial delivery attempt and bearing PVI meter postage. You may also find this mailpiece when it is being returned and a postage due clerk is marking it up at the Standard Mail (B) rate.

and weight. If the unendorsed mailpiece weighs more than 16 ounces and the metered or stamped postage is equal to or greater than the Priority rate consistent with the mailpiece's zone and weight, record the mailpiece as Priority Mail. For more information on unendorsed mail, see Section 3.15, Part 5, Unendorsed Mail.

- Standard Mail (A) paid at Standard Mail (B) rates: If you find a Standard Mail (A) single-rated mailpiece that has been paid at the Standard Mail (B) rate, record this mailpiece as Standard Mail (A) Single Piece. Choose Other Revenue and enter the revenue as Paid Correctly. Under most circumstances, you will find such mail on its initial delivery attempt and bearing PVI meter postage. You may also find this mailpiece when it is being returned as postage due.
- 1 From your Main Options Menu for Originating Mail, select COD or Insured.

Once you have selected a subsampling option, CODES displays the *Main Options Menu for Originating Mail* (Figure 3-107 and Figure 3-108). Select either COD or insured, depending on your mailpiece.

2 Select Option <4> Standard Mail (B).

CODES displays the *Main Options Menu for COD* or *Insured Mail* (Figure 3-109 or Figure 3-110). Select Option <4> from either menu.

3 Select one of the options given in the Standard Mail (B) Main Options Menu.

CODES displays the Standard Mail (B) Main Options Menu (Figure 3-131). Type the number of the appropriate option and press <Enter>: Parcel Post Zone Rated; Special Standard Mail (B) Single Piece and Bulk Presort; Bound Printed Matter Single Piece, Bulk, and Bulk Carrier Rt.; and Library Mail.

For definitions, see RM 3-07.

DECLARATION

I, Stephen E. Sellick, hereby declare under penalty of perjury that the foregoing answers are true and correct to the best of my knowledge, information, and belief.

Stephen E. Sellick

Dated: 1/27/00

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document in accordance with section 12 of the Commission's Rules of Practice.

John E. McKeever

Dated: July 27, 2000 Philadelphia, PA

65793